

FILED

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CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOSEPH OLOYEDE,
EDWARD OLUWASANMI,

Defendants.

) INDICTMENT

) **1:24 CR 00120**

) CASE NO. _____

) Title 18, United States Code,
) Sections 1343, 1349, 1957, and 2

) **JUDGE BOYKO**

GENERAL ALLEGATIONS

At all times relevant to this Indictment, unless otherwise specified:

The Economic Injury Disaster Loan Program

1. The United States Small Business Administration ("SBA") was an executive branch agency of the United States government. The mission of the SBA was to maintain and strengthen the nation's economy by enabling the establishment and viability of small businesses and assist in the economic recovery of communities after disasters.

2. The Coronavirus Aid, Relief, and Economic Security ("CARES") Act was a federal law enacted in or around March 2020 and was designed to provide emergency financial assistance to Americans suffering the economic effects caused by the COVID-19 pandemic. One source of relief under the CARES Act was authorization for the SBA to issue loans to small businesses and non-profit entities experiencing revenue loss due to the pandemic.

3. One form of such assistance was the Economic Injury Disaster Loan ("EIDL") program, which provided loan assistance for certain businesses negatively affected by the

COVID-19 pandemic. To qualify for an EIDL loan, a business had to, among other requirements, be in operation prior to February 1, 2020.

4. Applicants for EIDL loans used the SBA online portal to submit their application materials. The servers that processed the EIDL loan applications were outside the state of Ohio, in the states of Iowa, Virginia, or Washington.

5. Applicants had to certify that the information in the application was true and correct, under the penalty of perjury and applicable criminal statutes. The application process involved filling out data fields relating to the size and ownership of the affected business entity, and other information about the relevant business for the 12 months prior to COVID-19 impacting the national economy, such as the number of employees in the business, the gross business revenues realized, and the cost of goods sold. This information, submitted by the applicant, was then used by SBA systems to calculate the amount of money the applicant was eligible to receive.

6. Pursuant to the provisions governing the EIDL program, loan proceeds could only be used by the affected business receiving EIDL loans for certain permissible expenses. The loans could be used by the business to pay fixed debts, payroll, accounts payable, and other bills that could have been paid had the COVID-19 disaster not occurred.

7. The CARES Act also authorized the SBA to issue advances or grants of up to \$10,000 to small businesses. The amount of the advance was determined by the number of employees the applicant certified having (\$1,000 per employee, up to \$10,000). The advances did not have to be repaid, and documentation of employment was generally not required.

The Paycheck Protection Program

8. The CARES Act authorized forgivable loans to small businesses for job retention and certain other expenses, through a program referred to as the Paycheck Protection Program (“PPP”), which was administered by the SBA.

9. In order to obtain a PPP loan, a qualifying business submitted a PPP loan application, which was signed by an authorized representative of the business. The PPP loan application required the business (through its authorized representative) to acknowledge the program rules and make certain affirmative certifications in order to be eligible to obtain the PPP loan. In the PPP loan application (SBA Form 2483), the small business (through its authorized representative) was required to provide, among other things, its: (a) average monthly payroll expenses; and (b) number of employees. These figures were used to calculate the amount of money the small business was eligible to receive under the PPP. In addition, businesses applying for a PPP loan were required to provide documentation confirming their payroll expenses.

10. A PPP loan application was processed by a participating lender. If a PPP loan application was approved, the participating lender funded the PPP loan using its own monies. While it was the participating lender that issued the PPP loan, the loan was 100% guaranteed by the SBA. Data from the application, including information about the borrower, the total amount of the loan, and the listed number of employees, was transmitted by the lender to the SBA in the course of processing the loan. The servers that processed the PPP loan applications for the SBA were outside the state of Ohio, in the states of Virginia or Oregon.

11. PPP loan proceeds were required to be used by the business on certain permissible expenses—payroll costs, interest on mortgages, rent, and utilities. The PPP allowed the interest and principal on the PPP loan to be entirely forgiven if the business spent the loan proceeds on

these expense items within a designated period of time and used a defined portion of the PPP loan proceeds on payroll expenses.

Defendants, Person 1, Related Entities, and Banks

12. JOSEPH OLOYEDE (“OLOYEDE”) was a resident of Medina, Ohio.

OLOYEDE was the owner of the following entities incorporated in Ohio:

- a. Available Tax Services Inc. (“Available Tax Service”);
- b. Available Financial Corporation (“Available Financial”);
- c. Available Transportation Company (“Available Transportation”);
- d. Available Tutors Inc. (“Available Tutors”);
- e. Joseph Oloyede & Associates Limited (“JO&A”); and
- f. Company 1, a non-profit entity.

13. Available Transportation, Available Tutors, JO&A, and Company 1 conducted minimal business operations.

14. EDWARD OLUWASANMI (“OLUWASANMI”) was a resident of Cleveland, Ohio. OLUWASANMI was the owner of the following entities incorporated in Ohio:

- a. Dayspring Transportation Limited (“Dayspring Transportation”);
- b. Dayspring Holdings Inc. (“Dayspring Holdings”); and
- c. Dayspring Property Inc (“Dayspring Property”).

15. Dayspring Holdings and Dayspring Property conducted minimal business operations.

16. Person 1 was a resident of Medina, Ohio. Person 1 was associated with Company 1.

17. Bank 1 was a financial institution based in Columbus, Ohio and an approved SBA lender of PPP loans. OLOYEDE, OLUWASANMI, and Person 1 each owned and controlled bank accounts at Bank 1, including the following:

a. OLOYEDE controlled bank accounts at Bank 1 in the name of Available Tutors ending in 1545, in the name of Available Tax Services ending 2201, and an individual account ending in 6944. OLOYEDE also controlled a bank account at Bank 1 in the name of Company 1 ending in 5650 jointly with Person 1.

b. OLUWASANMI controlled bank accounts at Bank 1 in the name of Dayspring Holdings ending in 9959, and in the name of Dayspring Property ending in 0058.

18. Bank 2 was a financial institution based in Minneapolis, Minnesota and an approved SBA lender of PPP loans, and had bank branches located in Ohio. OLOYEDE, OLUWASANMI, and Person 1 each owned and controlled bank accounts at Bank 2, including the following:

a. OLOYEDE controlled bank accounts at Bank 2 in the name of Available Transportation ending in 6285, and in the name of JO&A ending in 5823.

b. OLUWASANMI controlled bank accounts at Bank 2 in the name of Dayspring Transportation ending in 8658 and 8666.

c. Person 1 controlled an individual bank account at Bank 2 in the name of Company 1 ending in 2369.

19. Bank 3 was a financial institution based in Pittsburgh, Pennsylvania and an approved SBA lender of PPP loans, and with bank branches in Ohio. OLOYEDE controlled a bank account at Bank 3 in the name of Available Tax Services ending in 9252. OLOYEDE also

controlled a bank account at Bank 3 in the name of Company 1 ending in 8024 jointly with Person 1.

20. Bank 4 was a financial institution based in Providence, Rhode Island and an approved SBA lender of PPP loans, and with bank branches in Ohio. OLOYEDE controlled a bank account at Bank 4 in the name of Available Financial ending in 8828.

21. A summary of the relevant individuals, businesses, and bank accounts are summarized in the below chart:

Account Holder	Business	Bank Account
OLOYEDE	Available Tax Service	Bank 1: x2201 Bank 3: x9252
	Available Financial	Bank 4: x8828
	Available Transportation	Bank 2: x6285
	Available Tutors	Bank 1: x1545
	JO&A	Bank 2: x5823
	Company 1	Bank 1: x5650 Bank 3: x8024
	Individual Account	Bank 1: x6944
OLUWASANMI	Dayspring Transportation	Bank 2: x8658 Bank 2: x8666
	Daysprings Holdings	Bank 1: x9959
	Dayspring Property	Bank 1: x0058
Person 1	Individual	Bank 2: x2369

COUNT 1

(Conspiracy to Commit Wire Fraud, 18 U.S.C. § 1349)

The Grand Jury charges:

22. The allegations contained in paragraphs 1 through 21 of this Indictment are incorporated by reference as if stated fully herein.

The Conspiracy and Scheme to Defraud

23. From in or around April 2020, and continuing through on or about February 28, 2022, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendants JOSEPH OLOYEDE and EDWARD OLUWASANMI knowingly and intentionally combined, conspired,

and agreed with each other and with others known and unknown to the Grand Jury, to commit federal fraud offenses, that is, to knowingly, and with the intent to defraud, devise, and intend to devise, a scheme and artifice to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, knowing that the pretenses, representations, and promises were false and fraudulent when made, and, for the purpose of executing the scheme and artifice, to knowingly transmit and cause to be transmitted, by means of wire communication in interstate commerce, certain writings, signs, signals, pictures and sounds, in violation of Title 18, United States Code, Section 1343.

Purposes of the Conspiracy and Scheme

24. The purposes of the scheme included, but were not limited to, the following: for Defendants and their co-conspirators to unlawfully enrich themselves by, among other things: (a) submitting, and causing to be submitted, false and fraudulent applications for loans and grants made available through the SBA to provide relief for the economic effects caused by the COVID-19 pandemic, including PPP and EIDL loans; (b) offering, paying, and receiving kickbacks in return for the submission of false and fraudulent loan applications and supporting documentation; and (c) diverting fraud proceeds for the Defendants' and co-conspirators' personal use, the use and benefit of others, and to further the conspiracy.

Manner and Means of the Conspiracy and Scheme

25. The manner and means by which Defendants and their co-conspirators carried out the conspiracy and scheme included, but were not limited to, the following:

a. OLOYEDE, OLUWASANMI, Person 1, and other co-conspirators, submitted and caused to be submitted PPP and EIDL loan applications containing false information for entities under their control, including Available Tax Services, Available

Financial, Available Transportation, Available Tutors, JO&A, Company 1, Dayspring Transportation, Dayspring Holdings, and Dayspring Property.

b. OLOYEDE assisted other co-conspirators and confederate borrowers who submitted and caused to be submitted PPP and EIDL loan applications containing false information for entities held by other co-conspirators and confederate borrowers.

c. OLOYEDE typically directed the co-conspirators and confederate borrowers to create an account and PPP and EIDL loan application using online loan portals at Banks 1 through 4 and the SBA.

d. OLOYEDE typically directed the co-conspirators and confederate borrowers to provide him with the account username and password and any subsequent security codes so he could submit the application and maintain account access throughout the loan process.

e. OLOYEDE typically directed the co-conspirators and confederate borrowers to forward all subsequent email correspondence regarding the loans to one of OLOYEDE's email accounts.

f. OLOYEDE and other co-conspirators and confederate borrowers created PPP and EIDL loan applications that falsified the applicant entities' operations and finances, including the number of employees and the amount of monthly payroll related to PPP loans, and gross revenue and cost of goods sold related to EIDL loans, to maximize loan approval amounts.

g. OLOYEDE and other co-conspirators and confederate borrowers caused the fraudulent PPP applications to be submitted, typically through the online loan portals at Banks 1 through Bank 4, and OLOYEDE coordinated the submission of fraudulent EIDL applications through the SBA's online loan portal.

h. OLOYEDE, OLUWASANMI, and other co-conspirators and confederate borrowers submitted and caused to be submitted falsified documents to support the falsified figures in the PPP and EIDL applications including the following tax and wage documents: Internal Revenue Service (“IRS”) Forms 941 (“Employer’s Quarterly Federal Tax Return”), IRS Form 940 (“Employer’s Annual Federal Unemployment Tax Return”), IRS Forms W-2 (“Wage and Tax Statements”), IRS Forms W-3 (“Transmittal of Wage and Tax Statements”), and Ohio Department of Job and Family Services (“ODJFS”) Quarterly Wage Reports.

i. OLOYEDE typically arranged with the co-conspirators and confederate borrowers to receive a percentage of their PPP and EIDL loans as a fee, or kickback, for obtaining the loan. These kickbacks were sent to OLOYEDE by the co-conspirators and confederate borrowers via check or other means shortly after the PPP and EIDL loans were funded.

Acts in Furtherance of the Conspiracy and Scheme to Defraud

26. In furtherance of the conspiracy, and to accomplish its object and purpose, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendants and their co-conspirators committed and caused to be committed the following acts, among others:

PPP Loans – OLOYEDE & OLUWASANMI Businesses

a. On or about the dates listed below, OLOYEDE and OLUWASANMI, submitted and caused to be submitted, fraudulent PPP applications for their businesses through Bank 1, Bank 2, Bank 3, and Bank 4, obtaining at least \$685,222, including the following PPP loan applications, to the following lenders, with funds directed to be deposited in accounts at the following banks:

Application Date	PPP Applicant and Business	Loan Amount	Lender	Deposit Bank
June 1, 2020	OLOYEDE, Available Transportation	\$31,787	Bank 2	Bank 2
June 11, 2020	OLOYEDE, Available Tutors	\$20,002	Bank 2	Bank 1
June 16, 2020	OLOYEDE, Available Financial	\$41,200	Bank 4	Bank 4
June 19, 2020	OLOYEDE, Available Tax Services	\$40,000	Bank 3	Bank 3
July 27, 2020	Person 1, Company 1	\$77,722	Bank 2	Bank 1
August 3, 2020	OLOYEDE, JO&A	\$51,558	Bank 2	Bank 2
February 12, 2021	OLOYEDE, JO&A	\$51,558	Bank 2	Bank 2
February 12, 2021	OLUWASANMI, Dayspring Transportation	\$69,970	Bank 2	Bank 2
February 16, 2021	OLOYEDE, Available Tax Services	\$40,000	Bank 1	Bank 1
February 22, 2021	OLOYEDE, Available Financial	\$41,200	Bank 4	Bank 4
March 11, 2021	OLUWASANMI, Dayspring Property	\$60,500	Bank 1	Bank 1
March 27, 2021	Person 1, Company 1	\$77,725	Bank 3	Bank 3
April 20, 2021	OLOYEDE, Available Tutors	\$20,000	Bank 1	Bank 1
April 30, 2021	OLUWASANMI, Dayspring Holdings	\$62,000	Bank 1	Bank 1

EIDL Advances and Loans– OLOYEDE & OLUWASANMI Businesses

b. On or about the dates listed below, OLOYEDE, OLUWASANMI, and Person 1 submitted fraudulent EIDL loan applications, and applications for reconsideration, for

their businesses to SBA, obtaining at least \$2,229,100, including the following applications, with the following amounts obtained as a result of these fraudulent EIDL applications, with funds directed to be deposited in accounts at the following banks:

Application / Reconsideration Date	EIDL Applicant and Business	Loan / Advance Amount	Deposit Bank
April 8, 2020	OLOYEDE, Available Tax Services	Declined	N/A
May 14, 2020	OLOYEDE, Available Tutors	\$4,100	Bank 1
May 14, 2020	OLOYEDE, Available Tutors (Advance)	\$8,000	Bank 1
June 20, 2020	OLOYEDE, Available Financial	Declined	N/A
June 20, 2020	OLOYEDE, Available Transportation	Declined	N/A
June 20, 2020	OLOYEDE, Available Transportation (Advance)	\$10,000	Bank 2
June 20, 2020	OLOYEDE, Available Financial (Advance)	\$10,000	Bank 4
July 13, 2020	OLOYEDE, JO&A	Declined	N/A
July 16, 2020	Person 1, Company 1	\$150,000	Bank 1
September 7, 2020	OLUWASANMI, Dayspring Holdings	\$150,000	Bank 1
September 7, 2020	OLUWASANMI, Dayspring Property	\$139,000	Bank 1
May 19, 2021	OLUWASANMI, Dayspring Holdings (Increase)	\$350,000	Bank 1
May, 22, 2021	OLUWASANMI, Dayspring Property (Increase)	\$361,000	Bank 1
June 14, 2021	OLOYEDE, JO&A (Advance)	\$10,000	Bank 2

Application / Reconsideration Date	EIDL Applicant and Business	Loan / Advance Amount	Deposit Bank
June 14, 2021	OLOYEDE, JO&A (Advance)	\$5,000	Bank 2
June 17, 2021	OLUWASANMI, Dayspring Property (Advance)	\$5,000	Bank 1
June 17, 2021	OLUWASANMI, Dayspring Property (Advance)	\$10,000	Bank 1
June 25, 2021	OLOYEDE, Available Transportation (Advance)	\$5,000	Bank 2
July 3, 2021	OLOYEDE, Available Tutors (Advance)	\$2,000	Bank 1
July 3, 2021	OLOYEDE, Available Tutors (Advance)	\$5,000	Bank 1
August 6, 2021	OLOYEDE, Available Financial (Advance)	\$5,000	Bank 4
October 7, 2021	OLOYEDE, JO&A (Reconsideration)	\$500,000	Bank 2
October 9, 2021	OLOYEDE, Available Transportation (Reconsideration)	\$500,000	Bank 2

PPP Loans – OLOYEDE “Clients”

c. On or about the dates listed below, OLOYEDE submitted and caused to be submitted fraudulent PPP applications in the names of co-conspirators and confederate borrowers and their businesses, through Bank 1, Bank 2, and Bank 3, obtaining at least \$724,956, including the following PPP loan applications, to the following lenders, with funds directed to be deposited in accounts at the following banks:

Application Date	PPP Applicant and Business	Loan Amount	Lender	Deposit Bank
July 27, 2020	Person 2, Company 2	\$46,348	Bank 2	Bank 2
July 31, 2020	Person 3, Company 3	\$37,900	Bank 3	Bank 3

Application Date	PPP Applicant and Business	Loan Amount	Lender	Deposit Bank
August 3, 2020	Person 4, Company 4	\$32,622	Bank 2	Bank 2
August 4, 2020	Person 2, Company 10	\$38,800	Bank 3	Bank 3
August 7, 2020	Person 5, Company 5	\$48,975	Bank 2	Bank 5
August 10, 2020	Person 6, Company 6	\$40,000	Bank 3	Bank 3
January 30, 2021	Person 7, Company 7	\$58,255	Bank 3	Bank 3
February 5, 2021	Person 2, Company 10	\$38,800	Bank 3	Bank 3
February 12, 2021	Person 3, Company 3	\$37,900	Bank 3	Bank 3
March 13, 2021	Person 2, Company 2	\$46,348	Bank 2	Bank 2
March 21, 2021	Person 6, Company 6	\$40,000	Bank 3	Bank 3
March 25, 2021	Person 6, Company 6	\$48,975	Bank 2	Bank 5
March 27, 2021	Person 7, Company 7	\$58,255	Bank 3	Bank 3
April 13, 2021	Person 4, Company 4	\$32,622	Bank 2	Bank 2
April 24, 2021	Person 8, Company 8	\$48,722	Bank 3	Bank 3
April 27, 2021	Person 9, Company 9	\$70,435	Bank 3	Bank 3

EIDL Advances and Loans – OLOYEDE “Clients”

d. On or about the dates listed below, OLOYEDE submitted and caused to be submitted fraudulent EIDL applications, and applications for reconsideration, in the names of co-conspirators and confederate borrowers and their businesses, obtaining at least \$574,100, including the following applications, with the following amounts obtained as a result of these fraudulent EIDL applications, with funds directed to be deposited in accounts at the following banks:

Application / Reconsideration Date	EIDL Applicant and Business	Loan / Advance Amount	Deposit Bank
July 21, 2020	Person 2, Company 2	Declined	N/A
September 13, 2020	Person 2, Company 10	\$44,100	Bank 3
November 7, 2021	Person 2, Company 2 (Reconsideration)	\$500,000	Bank 2
June 17, 2021	Person 2, Company 2 (Advance)	\$5,000	Bank 2
June 17, 2021	Person 2, Company 10 (Advance)	\$10,000	Bank 3
June 17, 2021	Person 2, Company 2 (Advance)	\$10,000	Bank 2
June 17, 2021	Person 2, Company 10 (Advance)	\$5,000	Bank 3

All in violation of Title 18, United States Code, Section 1349.

COUNTS 2-10
(Wire Fraud, 18 U.S.C. §§ 1343 and 2)

The Grand Jury further charges:

27. The factual allegations of Count 1 of this Indictment are realleged and incorporated by reference as if fully set forth herein.

The Scheme to Defraud

28. From in or around April 2020, and continuing through on or about February 28, 2022, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendants JOSEPH OLOYEDE and EDWARD OLUWASANMI, with the intent to defraud, did devise, and intend to devise, a scheme and artifice to defraud, and to obtain money and property from the SBA and participating PPP lenders by means of materially false and fraudulent pretenses, representations,

and promises, knowing that the pretenses, representations, and promises were false and fraudulent when made.

Purposes of the Scheme

29. The purposes of the scheme included, but were not limited to, the purposes alleged in paragraph 24 of this Indictment.

Manner and Means of the Scheme

30. The manner and means by which Defendants carried out the scheme included, but were not limited to, the manner and means alleged in paragraph 25 of this Indictment.

Execution of the Scheme

31. On or about each of the dates set forth below, in the Northern District of Ohio, Eastern Division, and elsewhere, the defendants identified below, for the purpose of executing the scheme described above, and attempting to do so, transmitted, and caused to be transmitted, by means of wire communication in interstate commerce the following writings, signs, signals, pictures, and sounds, each transmission constituting a separate count of this Indictment:

Count	Defendant	Date	Transmission Description	Originating Location	Recipient and Location
2	JOSEPH OLOYEDE	June 16, 2020	Electronic submission of PPP loan application in the name of Available Financial	Ohio	SBA, Virginia
3	JOSEPH OLOYEDE, EDWARD OLUWASANMI	September 11, 2020	Bank transfer from the SBA of \$138,900 for EIDL loan in the name of Dayspring Property	Colorado	OLUWASANMI, Ohio
4	JOSEPH OLOYEDE,	September 11, 2020	Bank transfer from the SBA of \$149,900 for EIDL	Colorado	OLUWASANMI, Ohio

Count	Defendant	Date	Transmission Description	Originating Location	Recipient and Location
	EDWARD OLUWASANMI		loan in the name of Dayspring Holdings		
5	JOSEPH OLOYEDE, EDWARD OLUWASANMI	August 12, 2021	Bank transfer from the SBA of \$350,000 for EIDL loan in the name of Dayspring Holdings	Colorado	OLUWASANMI, Ohio
6	EDWARD OLUWASANMI	March 11, 2021	In-person submission of PPP loan application in the name of Dayspring Property	Ohio	SBA, Oregon
7	JOSEPH OLOYEDE	April 20, 2021	Electronic submission of PPP loan application in the name of Available Tutors	Ohio	SBA, Oregon
8	JOSEPH OLOYEDE, EDWARD OLUWASANMI	August 31, 2021	Bank transfer from the SBA of \$361,000 for EIDL loan in the name of Dayspring Property	Colorado	OLUWASANMI, Ohio
9	JOSEPH OLOYEDE	February 15, 2022	Bank transfer from the SBA of \$499,900 for EIDL loan in the name of JO&A	Colorado	OLOYEDE, Ohio
10	JOSEPH OLOYEDE	February 16, 2022	Bank transfer from the SBA of \$499,900 for EIDL loan in the name of Available Trans	Colorado	OLOYEDE, Ohio

All in violation of Title 18, United State Code, Sections 1343 and 2.

COUNTS 11-13

(Engaging in Monetary Transactions in Criminally Derived Property, 18 U.S.C. §§ 1957 and 2)

The Grand Jury further charges:

32. The factual allegations of Counts 1 through 10 of this Indictment are realleged and incorporated by reference as if fully set forth herein.

33. On or about the dates listed below, in the Northern District of Ohio, Eastern Division, and elsewhere, the defendants identified below did knowingly engage and attempt to engage in the following monetary transaction by, through, and to a financial institution, affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000, such property having been derived from specified unlawful activity, to wit, Wire Fraud, in violation of Title 18, United States Code, Section 1343, each transaction constituting a separate count of this Indictment:

Count	Defendant	Date	Amount	Account	Transaction Description
11	EDWARD OLUWASANMI	September 18, 2020	\$221,880.40	Bank 1 – x9975	Wire transfer to a title agency for the purchase of commercial property at 422 South Green Road, South Euclid, Ohio
12	EDWARD OLUWASANMI	October 26, 2021	\$1,000,000	Bank 2 – x8666	Wire transfer to a Dayspring Transportation brokerage account
13	JOSEPH OLOYEDE	July 25, 2022	\$24,473.62	Bank 4 – x8828	OLOYEDE caused a payment by check to be issued to a general contractor as payment for the building of a residence at 4641 Foote Rd., Medina, Ohio

All in violation of Title 18, United States Code, Sections 1957 and 2.

FORFEITURE

The Grand Jury further charges:

34. The allegations of Counts 1-13 of this Indictment are hereby re-alleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C), Title 18, United States Code, Section 982(a)(2), and Title 28, United States Code, Section 2461(c) (wire fraud/wire fraud conspiracy offenses); and, Title 18, United States Code, Section 982(a)(1) (money laundering offenses). As a result of the foregoing offenses, defendants JOSEPH OLOYEDE and EDWARD OLUWASANMI shall forfeit to the United States: all property, real and personal, which constitutes—or is derived from—proceeds traceable to the commission of the wire fraud/wire fraud conspiracy offenses; all property constituting, or derived from, proceeds the defendants obtained, directly or indirectly, as the result of the wire fraud/wire fraud conspiracy offenses; and, any and all property, real and personal, involved in the money laundering offenses, and any property traceable to such property; including, but not limited to:

a. The real property located at 422 South Green Road, South Euclid, Cuyahoga County, Ohio; Permanent Parcel Nos. 701-13-064, 701-13-065, 701-13-066, and 701-13-123. The property was purchased in or around September 2020. The property is titled to Dayspring Property Incorporated and associated with EDWARD OLUWASANMI.

b. The real property located at 4641 Foote Road, Medina, Medina County, Ohio; Parcel No. 026-06D-21-105. The property was purchased in or around May 2021, and is associated with JOSEPH OLOYEDE.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.